

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

JOVAN VAVIC

)
)
)
) No.1:19-CR-10081-IT-2
)
)
)
)

**MOTION FOR LEAVE TO FILE UNDER SEAL A NOTICE OF INTENT TO
ASSERT FIFTH AMENDMENT RIGHTS**

Subpoenaed non-party Katie Fuller seeks leave to file under seal her notice of intent to assert her Fifth Amendment rights in response to the trial subpoena issued to her by defendant Jovan Vavic. As grounds therefor, Ms. Fuller states that her notice and accompanying exhibits contain sensitive, confidential, and personally identifiable information. Accordingly, under Local Rule 7.2, Ms. Fuller respectfully requests that the Court grant her leave to file under seal: (a) her notice, and (b) the exhibits thereto.

KATIE FULLER

By her attorneys,

/s/ Payal Salsburg

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Dated: March 10, 2022

CERTIFICATE OF SERVICE

I hereby certify that on this date this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the NEF and paper copies will be sent to those indicated as non-registered participants.

/s/ Payal Salsburg

Payal Salsburg